

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

WINFRED MUCHIRA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:14-cv-770 (AJT/JFA)
)	
HALAH AL-RAWAF, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S TRIAL EXHIBITS AND WITNESSES

In accordance with the Court's Order of August 18, 2014, Defendants object to the following numbered trial exhibits submitted by Plaintiff on the grounds indicated by the following initials: H – hearsay; R- relevance; F – lack of foundation; P – unfair prejudice; C – cumulative;; A – no proof of authenticity ; U – unreadable or incomplete.

Ex. No, Description: Objections

1. Form I-914, Supplement B: H, R, F, P.
2. Memorandum from Denise Johnson to Arrikka Drew: H, R, F, P.
4. Approval of T visa application: H, R, F, P.
6. Wells Fargo transfers of funds: H, R, F.
7. Pictures: H, R, F, C.
8. One sentence page, two unreadable pages, and letter from Duane Morris with attachments: H, R, F, U.
9. Pictures of Passport: H, R, F, A.
10. Subpoena to Equity Residential and responsive documents: H, R, F.
11. Postings in Swahili: H, R, F, A.

14. Brochure on human trafficking: H, R, F, U.
15. Biographical information about Stephen Edson: H
17. ICE news release: H, R, F.
18. GAO report on human rights: H, R.
21. Information from DHS for law enforcement personnel: H, R, F.
22. Letter from Duane Morris to extend visa, with attachments: R, C.
23. Grant of extension of visa: H, R.
24. DHS memo to Arrikka Drew from Denise Johnson: H, R, F, P.
25. FLSA calculations: H, R, F, P, A.
26. FLSA calculations: H, R, F, P, A.
27. FLSA calculations: H, R, F, P, A.
28. FLSA calculations: H, R, F, P, A.
29. FLSA calculations: H, R, F, P, A.
30. FLSA calculations: H, R, F, P, A.
31. Biographical information about Richard Mormile: H.
32. Biographical information about Florence Burke: H.
33. Biographical information about Eric Goldsmith: H.
34. Polaris Project evaluation of Winfred Muchira: H, F, P.
35. Muchira contract of employment: H, F, C.
37. Letter from Duane Morris to apply for visa extension: H, R, F, C.
38. Application to change status of Winfred Muchira: H, R, F, C.
39. Receipt of application to change status of Winfred Muchira: H, R, F, C.
40. Lease for Waterfalls home: H, R, F.

41. Letter from Ibraheem Alrashoudi to David Murithi: H, R, F.
42. Letter from Ibraheem Alrashoudi to David Murithi: H, R, F.
43. Net worth report on Alrashoudi Family: R, P.
44. Pictures: H, R, F, C, A.
45. Declaration of Eric Turnbaugh: H, R, F.
46. Contract of employment and documents from Duane Morris: H, R, F, C.
47. Affidavit of Service of Eric Turnbaugh: H, R, F, C.
48. Picture of alarm: H, R, F, U, A.
49. Summons: R.
50. Duane Morris application for extension of visa: H, R, F, C.
51. Approval of extension of visa: H, R, F.
52. Goldsmith expert report: H.
53. Burke expert report: H.
54. Mormile expert report: H.
55. Edson expert report: H.
57. G-28 entry of appearance on behalf of Winfred Muchira: H, R, F.
63. Letter from Duane Morris for extension of visa with attachments: H, R, F, C.
64. Report on human trafficking: H, R, F.
66. Record of deportation of alien: H, R, F.
67. Picture: H, R, F, A, U.
68. Passport: H, R, F.
69. Notebook: H, R, F.
70. HTC phone: H, R, F, A.

71. Nokia phone: H, R, F, A.

In addition, defendants object to plaintiff's designation of Denise Sabagh as a trial witness on the ground that plaintiff did not identify her in plaintiff's initial disclosures or in the amendments to those initial disclosures.

Respectfully submitted,

/s/ Jay M. McDannell

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CERTIFICATE OF SERVICE

I certify that today, January 26, 2015, I electronically filed the foregoing Objections to Plaintiff's Trial Exhibits and Witnesses with the Clerk of the Court using the CM/ECF system, which will automatically send a notification of such filing (NEF) to the following:

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